

HILL RIVKINS & HAYDEN LLP
Attorneys for Plaintiff
45 Broadway, Suite 1500
New York, New York 10006
Tel: (212) 669-0600
Fax: (212) 669-0699

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARTRADE SHIPPING & TRANSPORT,
GmbH

Plaintiff,

VS.

SASCO GmbH,

Defendant.

Index No.: 08 CV 1304(GBD)

**NOTICE OF MOTION FOR
DEFAULT JUDGMENT**

PLEASE TAKE NOTICE that Plaintiff Martrade Shipping & Transport, GmbH, by and through its attorneys Hill Rivkins & Hayden LLP, upon the Affirmation of Christopher M. Panagos dated June 25, 2008, and the exhibits attached thereto, the accompanying Statement of Damages and Memorandum of Law, the Certification of Richard Verney, and all the pleadings heretofore had herein, hereby moves this Court before the Honorable George B. Daniels, at the United States Courthouse, 500 Pearl Street, New York, New York, for an Order entering judgment by default against Defendant SASCO GmbH and recognizing and enforcing the London Arbitration Award dated September 14, 2007 in the matter of the “Capt. George Tsangaris’; charterparty dated 25th November 2005” in favor of Plaintiff Martrade Shipping & Transport, GmbH and against Defendant SASCO GmbH and for such other and further relief as this Court may deem just and proper.

Dated: New York, New York
June 27, 2008



Michael D. Wilson (MW- 5633)
Christopher M. Panagos (CP-2199)
HILL RIVKINS & HAYDEN LLP
Attorneys for Plaintiff
45 Broadway, Suite 1500
New York, New York 10006
Tel: (212) 669-0600
Fax: (212) 669-0699

CERTIFICATE OF SERVICE

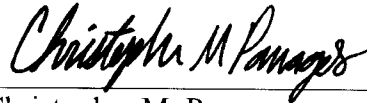
I hereby certify that true and correct copies of the foregoing Notice of Motion, Plaintiff's Memorandum of Law, Statement of Damages, Declaration of Christopher M. Panagos, and Certification of Richard Verney, were served upon the following via International Airmail on June 25, 2008:

Sasco GmbH
Hohe Bleichen 5
20354 Hamburg, Germany

c/o

Jan H. Wilhelm, Esq. - Receiver
hww wienberg wilhelm
Albert-Einstein-Ring 11/15
22761 Hamburg, Germany

Dated: June 27, 2008



Christopher M. Panagos